

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,                     )  
   )  
                  Plaintiff,                         )  
   )  
vs.   ) Case No.: 4:15-cr-403-2 HEA (SPM)  
   )  
CHARLES FLOWERS,                                )  
   )  
                  Defendant.                        )

**FIRST MOTION TO CONTINUE TRIAL**

COMES NOW Defendant, Charles Flowers, by and through counsel, and hereby moves this Court to continue the trial presently scheduled for February 8, 2016 for a period of thirty (30) days. In support of this motion, Defendant states as follows.

1. Defendant is charged with a single violation of Title 21 U.S.C. § 841(a)(1).
2. Defendant and the government expect this matter to culminate in a plea agreement.
3. However, Defendant and the government have not yet finalized the terms of this agreement and cannot do so prior to February 8, 2016.
4. The parties expect to finalize these terms and all outstanding matters within the next seven to ten days.
5. For this reason, Defendant files the instant motion.
6. For this same reason, the instant motion is necessary to provide counsel for the “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, “the ends of justice

served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

7. Defendant, through counsel, has discussed this matter with assistant United States attorney Sirena Wissler. Ms. Wissler does not object to Defendant’s request.

8. Defendant will file a waiver of his rights under 18 U.S.C. § 3161 et seq., no later than tomorrow’s date.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the trial presently scheduled for February 8, 2016 for a period of thirty (30) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Ms. Sirena Wissler, assistant United States attorney.